



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/lg/89 DATE: April 30, 2007

C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler

RE: **Status Report # 18 for the Resource Recovery Group/Clayton Chemical Company Site**

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this eighteenth Monthly Status Report is March 26, 2007, through April 27, 2007.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 17 was submitted to U.S. EPA on March 30, 2007.

It should be noted that on page 4 of Status Report # 17, the date range for Appendix C was incorrectly presented as March 12 - 16, 2006. The correct data should have been March 12 - 16, 2007. Also, in Status Report # 17, the incorrect product name was used for the granular absorbent. The phrase "Oil Dry" was used in Status Report # 17, while the correct product name is Oil Dri®. This incorrect phrase was also used in the Weekly Summary Report for the week of March 12 - 16, 2007.

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities completed during the reporting period were primarily related either to the shipment of the final quantities of waste materials generated during the planned Removal Action or developing a response to the subsurface oil discovered at the northeast quadrant of the Site on March 16, 2007. Field activities were performed during visits to the Site during three (3) of the five (5) weeks discussed in this report.



On March 30, 2007, Conestoga-Rovers & Associates (CRA) oversaw the shipment of the final two (2) roll off boxes containing material from the demolished EZ 4 Loading Dock, the 37 remaining drums of non-hazardous material present at the Site when the Removal Action activities were initiated, and the two (2) drums of material removed from Tank 3 as part of the tank demolition phase of the project. These waste containers were taken into the 10-day storage program of the transporter of record before being shipped to the Veolia Environmental Services, Inc. (Veolia) Port Arthur (PTA) incinerator facility in Port Arthur, Texas for final disposal.

CRA conducted Site inspections during the weeks of April 2 and 16, 2007 with the primary goal of monitoring Site conditions related to the oil situation. START Bob Hill was present during the two (2) visits and no changes in Site/area conditions were noted during these visits. No field activities were completed during the weeks of April 9 and 23, 2007.

Additional details of the completed tasks are provided for review in this report.

A weekly summary of activities appears below:

- During the week of March 26, 2006 (March 26 – 30, 2007), the primary activities that were completed centered on CRA's attempts to arrange for the off Site disposal of Site wastes (drummed wastes and EZ 4 Loading Dock materials) and the submission of the monthly Status Report.

On March 29, 2007, CRA was informed by Veolia that the two (2) roll off boxes that were shipped from the Site on March 23, 2007 were still in the 10-day storage program at the Veolia Trade Waste Incinerator (TWI) facility. CRA was told that the roll off boxes, which were to have been transported to the Veolia PTA during the week, would instead enter the 10-day storage program for Midwest Sanitary Service (Midwest), the waste hauler, on March 30, 2007, before being shipped to the PTA facility during the week of April 2, 2007. The final two (2) roll off boxes remaining at the Site would be delivered to the TWI 10-day storage program from the Site on March 30, 2007, then subsequently be accepted into the Midwest 10-day program before being transported to PTA for disposal.

CRA and START Bob Hill were on Site on March 30, 2007 to oversee the shipment of the final two (2) roll off boxes with the material from the EZ 4 Loading Dock structure. Additionally, CRA and START Hill monitored the loading and off Site shipment of the remaining drummed wastes at the Site. A total of 37 drums of wastes previously characterized as non-hazardous were transported off Site, along with two (2) drums of material recovered from the former Tank 3 during the tank demolition phase. The contents of two (2) of the 37 drums were repacked into 1-cubic yard Gaylord boxes, while two (2) additional drums were placed into 85-gallon overpack drums for shipment. The drums were taken to TWI, where eight (8) were scheduled for incineration. The remaining drums were subsequently shipped to PTA for final disposal.

After the shipment of the waste material was completed, CRA and START Hill completed an inspection of the area where the oil was noted and conducted an investigation of the manhole discovered on March 23, 2007, east of the Site entrance. No apparent change was noted either for the installed Oil Dri® or the surface soils in the vicinity.

The manhole investigation was completed by lowering a disposable plastic bailer into the uncovered opening to the manhole until the apparent bottom of the structure was encountered, removing the bailer and observing the contents. Based on this exercise, the manhole was roughly seven (7) feet deep, appeared to have mud and/or sediments along the bottom, and contained roughly six (6) inches of a brown, muddy liquid which did not display any signs of an oil layer or visible sheen;

- The primary activities completed during the week of April 2, 2007 involved the development of a response strategy/plan to address the situation with the oil at the northeast portion of the Site. On April 2, 2007, OSC Turner contacted The Respondents via e-mail with questions regarding the analytical results provided for the liquid sample collected on March 16, 2007. An initial response was provided via e-mail that a formal response would be provided in the form of an Oil Response Plan that was being developed. CRA completed a Site visit on April 5, 2007 to inspect the northeast portion of the Site for any changes in conditions. No notable changes were observed during the inspection which was performed with START Bob Hill in attendance;
- For the week of April 9, 2007, the primary focus of Site-related activities was the development of the Oil Response Plan and the evaluation of the received contractor bids for oil removal/disposal services. No on Site activities were performed during the week;
- The development of the Oil Response Plan was once again the primary activity for the week of April 16, 2007. A Site visit was performed on April 19, 2007 during which an inspection of the northeast corner of the site was completed with START Bob Hill. No notable changes in area conditions were noted. Also, The Respondents submitted the Oil Response Plan to the U.S. EPA for review on April 19, 2007; and
- The activities performed for the Site during the week of April 23, 2007 consisted of attempts to tentatively schedule the personnel and services needed to execute the activities discussed in the Oil Response Plan that was submitted to U.S. EPA on April 19, 2007. On April 26, 2007, OSC Turner requested that the proposed activities not take place without him being present. Accordingly, CRA and The Respondents subsequently made inquiries of the involved parties as to whether the schedule proposed by OSC Turner could be accommodated.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for March 26 – 30, 2007; Appendix B – Weekly Summary of Site Activities for April 2 – 6, 2007; Appendix C – Weekly Summary of Site Activities for April 9 – 13, 2007; Appendix D – Weekly Summary of Site Activities for April 16 – 20, 2007; and Appendix E – Weekly Summary of Site Activities for April 23 – 27, 2007.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by the Respondents. This request was approved by OSC Turner on April 20, 2006. However, TEK-Lab, Inc. of Collinsville, Illinois has been used for the performance of waste characterization sample analysis to assist with/complete waste disposal activities.

No samples were collected at the Site during the reporting period.

On March 29, 2007, CRA received electronic copies of the screening results for the samples created by Veolia TWI personnel following the March 6, 2007, Veolia drum sampling event. To recount those activities, Veolia personnel collected 27 samples from the 37 drums of non-hazardous wastes at the Site for waste characterization/screening purposes. Those 27 samples were subsequently composited to create seven (7) samples which were analyzed at the TWI laboratory. The resultant screening data was provided to CRA, and copies are included with this report as Appendix F.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through E of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

No significant technical problems were encountered during the reporting period. Similarly, no technical problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As stated in Section 1.2, no samples were collected at the RRG/Clayton Site during the reporting period. Waste screening samples were collected by Veolia personnel on March 6, 2007. Although a summary of the screening data was received by CRA and provided in Status Report # 17, the reports from the screening analysis were not received by CRA until March 29, 2007. As stated previously, those reports are being provided as Appendix F of this Status Report.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 SITE PLANS

During the upcoming reporting period (April 30, 2007, through May 25, 2007), the following activities are anticipated:

- Activities discussed in the submitted Oil Response Plan will be initiated;
- Activities related to the U.S. EPA proposed investigation of the Waste Drum Storage (Drum) Building loading dock structure will be initiated;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the activities discussed above and weather conditions; and
- Site restoration activities, weather permitting, will be initiated.

4.2 SAMPLING AND ANALYSIS

No sampling is anticipated during the upcoming reporting period.

4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the removal and investigation of the subsurface oil at the northeast portion of the Site, the investigation of the interior of the Drum Building loading dock, and limited Site restoration activities. An anticipated schedule for these activities appears below.

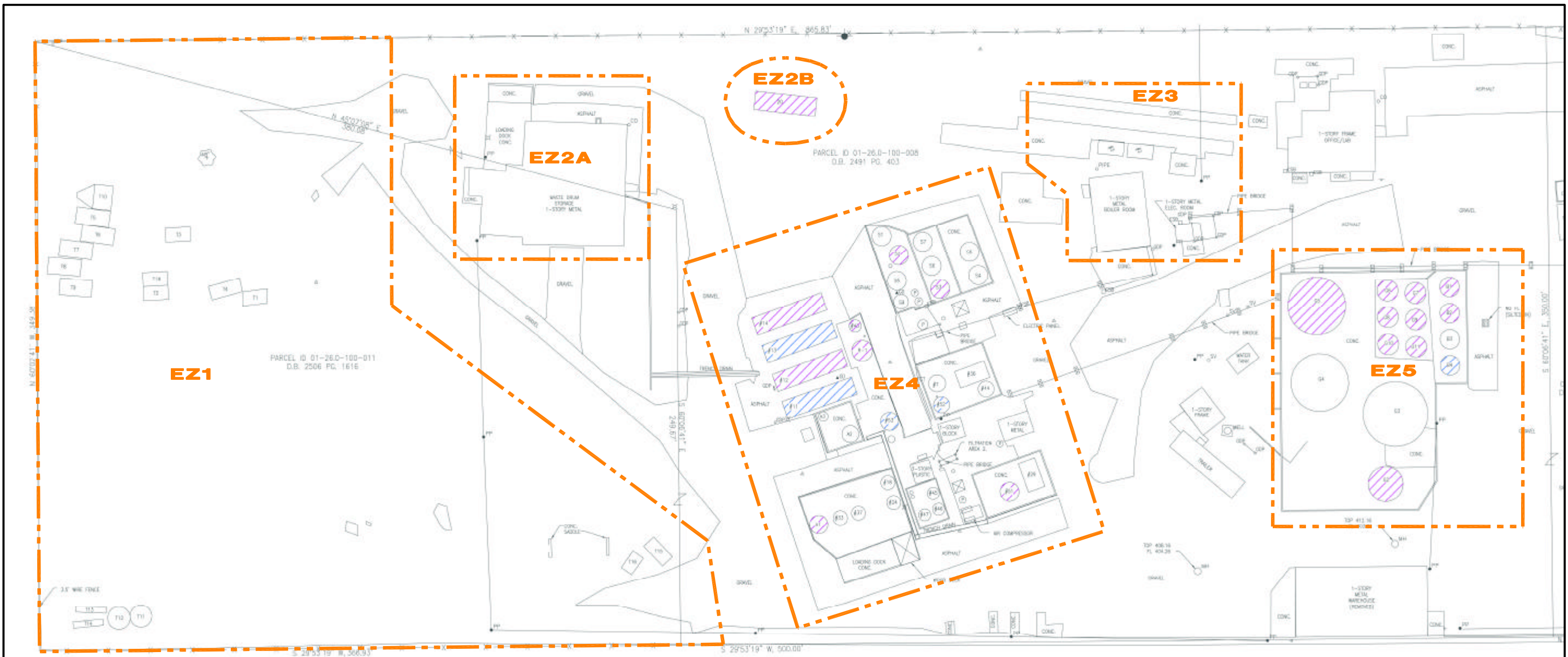
5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Install Stormwater Control Measures	As needed/ongoing	April 30, 2007
Continue Technical Design and Construction Scheduling of Proposed Landfill Cap	Ongoing/30 days	April 30, 2007
Initiate the Proposed Oil Response Activities	Ongoing/30 days	To be determined
Initiate the Proposed Drum Building Loading Dock Investigation Activities	Ongoing/30 days	To be determined
Initiate Site Restoration Activities	Ongoing/30 days	April 30, 2007
Submit Status Report # 19	1 day	May 31, 2007

Attachments

FIGURE 1

SITE MAP



LEGEND

	CABLE SERVICE BOX		POWER POLE
	CLEANOUT		GUY WIRE
	ELECTRIC SERVICE BOX		PIPE BRIDGE FOUNDATION
	FAUCET		SEWER VENT
	FIRE HYDRANT		WATER MANHOLE
	GAS DRIP		SMALL VAT POTS IN PROCESS AREA (<5'x5')
	GAS VALVE		TANKS WITH "WEEPING"
	GUIDEPOST		TANKS WITH SOLIDS REMAINING
	LIGHT STANDARD		
	MAILBOX		
	SIGN		
	MANHOLE		
	OLD IRON PIPE		

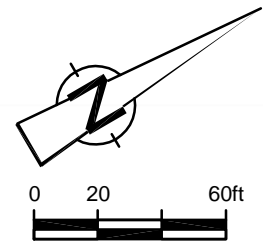


figure 1
 SITE WORKZONE LAYOUT MAP
 RRG CLAYTON CHEMICAL
 Sauget, Illinois



APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR MARCH 26 -30, 2007



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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/85 DATE: April 30, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For March 26 – 30, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the sixty-ninth week (the period March 26 through March 30, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
March 26, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

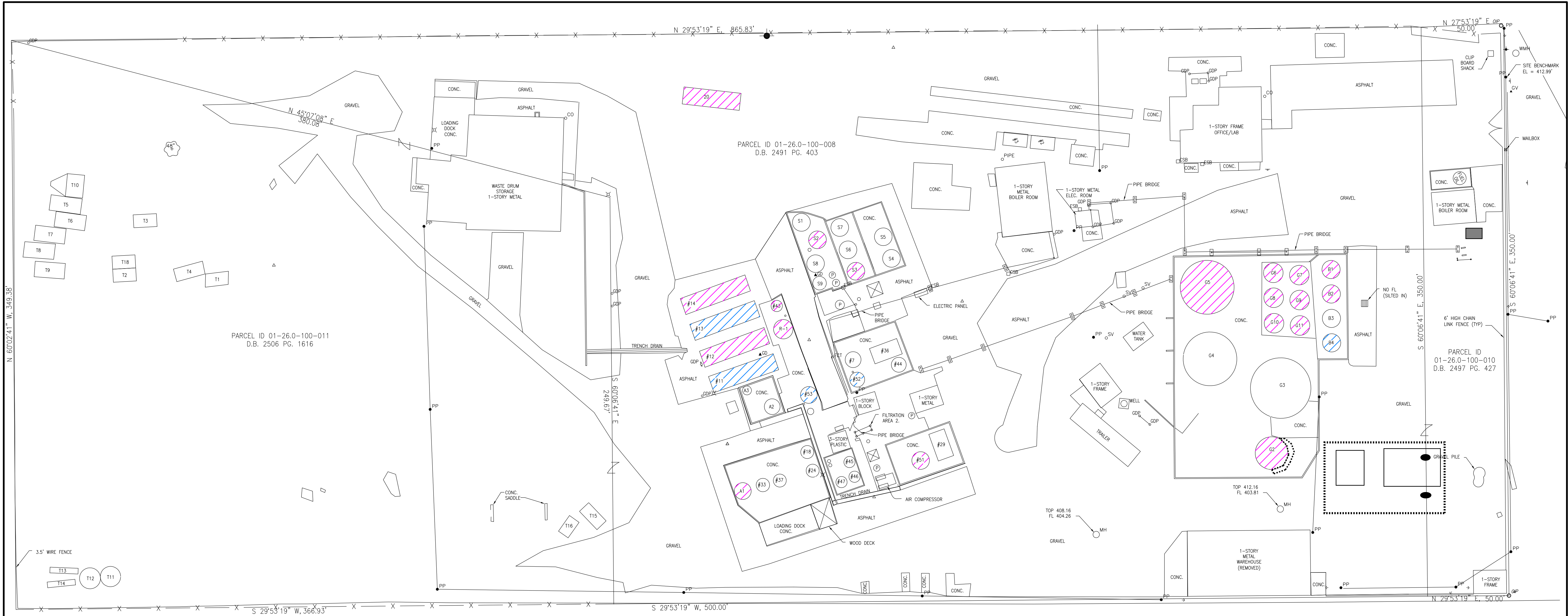
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
March 26, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the disposal of the EZ 4 Loading Dock soils. CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site
March 27, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils. CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site
March 28, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was contacted by e-mail and told of planned Site visit on March 30, 2007
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
March 28, 2007	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of non-hazardous materials from the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils. CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site
March 29, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was contacted via telephone regarding CRA's expected schedule for the planned March 30, 2007 Site visit
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA schedules the removal of the drums of tank 3 material with Veolia for March 30, 2007
	Drum Characterization/Disposal	No on Site activity. CRA schedules drum removal activities with Veolia for March 30, 2007. CRA received a copy of the screening results from the 28 drum samples collected by Veolia on March 6, 2007 from the 37 drums of non-hazardous materials at the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
March 29, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils. CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site. CRA also schedules an on Site meeting with one potential oil removal contractor for March 30, 2006
March 30, 2007	Mobilization Activities	CRA mobilized to the Site
	Project Coordination	START Bob Hill was on Site to observe Site activities. The Respondents submitted Status Report # 17 to USEPA/OSC Turner via e-mail
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	2 drums of tank 3 materials were shipped off Site for disposal
	Drum Characterization/Disposal	37 drums of non-hazardous wastes, including 4 drums that were repackaged into 2 1-yd ³ Gaylord boxes and 2 85-gallon over pack drums, were shipped offsite for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA oversaw the shipment of the final 2 roll off boxes containing EZ 4 Loading Dock materials. A total of 8 roll off boxes containing roughly 110 tons of materials were sent to the Veolia Port Arthur, TX facility for disposal in 4 weekly shipments of 2 boxes per week. CRA also completed the weekly Hazardous Waste Inspection of the roll off box staging area. No notable change in area conditions was noted. CRA performed an inspection of the area where oil was discovered/Oil Dry® was installed on the surrounding area. No changes in area conditions were noted. Also, CRA met with an oil removal contractor to continue development of an oil response plan/strategy

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), or Phil Harvey (773-380-9933) for clarification.

Attachment



- Overall area of potential oil impact
- Approximate Oil Dry area
- Partially buried manhole
- Opening exposing subsurface oil

- LEGEND
- CABLE SERVICE BOX
 - CLEANOUT
 - ELECTRIC SERVICE BOX
 - FAUCET
 - FIRE HYDRANT
 - GAS DRIP
 - GAS VALVE
 - GUIDEPOST
 - LIGHT STANDARD
 - MAILBOX
 - SIGN
 - MANHOLE
 - OLD IRON PIPE
 - POWER POLE
 - GUY WIRE
 - PIPE BRIDGE FOUNDATION
 - SEWER VENT
 - WATER MANHOLE
 - SMALL VAT POTS IN PROCESS AREA (<5'X5')
 - TANKS WITH "WEEPING"
 - TANKS WITH SOLIDS REMAINING

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THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED BY ANY MEANS. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

IN CHARGE OF _____	DESIGNED BY _____ CHECKED BY _____	DRAWN BY _____
NO.	DATE	REVISION
INIT.		

RESOURCE RECOVERY GROUP
CLAYTON CHEMICAL SITE
LIQUIDS REMOVAL PHASE
SAUGET, ILLINOIS

SITE PLAN

FILE NO.
11331.31861

DATE
JULY 2004

1

APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR APRIL 2 - 6, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/84 DATE: April 30, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For April 2 - 6, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventieth week (the period April 2 through April 6, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 2, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents were contacted by OSC Kevin Turner via e-mail regarding the analytical results from the March 16, 2007, oil sample. OSC Turner had questions about data presented. The Respondents informed OSC Turner via e-mail that his questions and concerns would be addressed in the Response Plan that was being developed for his review
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site

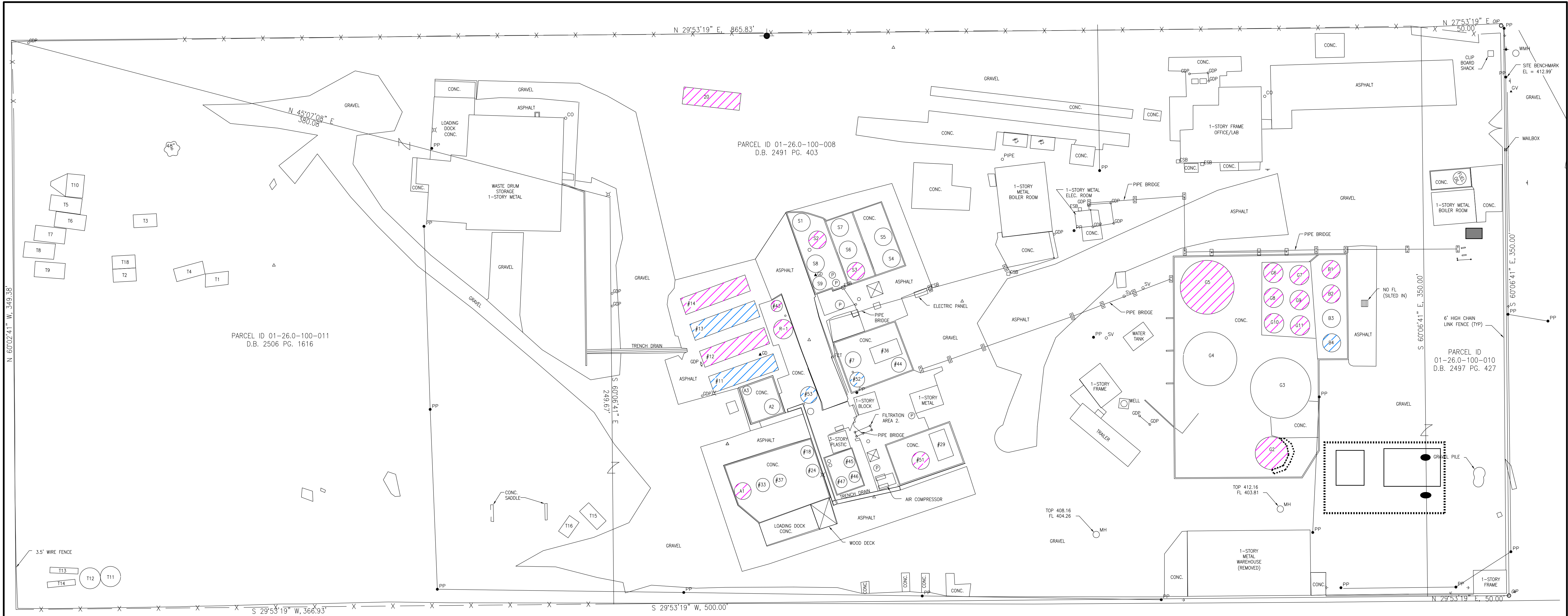
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 2, 2007	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site. CRA received the first bid response from the four removal contractors contacted
April 3, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site
April 4, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was contacted by telephone and told of the planned Site visit on April 5, 2007
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 4, 2007	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site. CRA received the second bid response from the contacted oil removal contractors
April 5, 2007	Mobilization Activities	CRA mobilized to the Site
	Project Coordination	START Bob Hill was on Site to observe activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site. CRA received the third bid response from the contacted oil removal contractors. CRA performed an inspection of the area where oil was discovered/Oil Dry® was installed on the surrounding area. No changes in area conditions were noted
April 6, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 6, 2007	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), or Phil Harvey (773-380-9933) for clarification.

Attachment



- Overall area of potential oil impact
- Approximate Oil Dry area
- Partially buried manhole
- Opening exposing subsurface oil

- LEGEND
- CABLE SERVICE BOX
 - CLEANOUT
 - ELECTRIC SERVICE BOX
 - FAUCET
 - FIRE HYDRANT
 - GAS DRIP
 - GAS VALVE
 - GUIDEPOST
 - LIGHT STANDARD
 - MAILBOX
 - SIGN
 - MANHOLE
 - OLD IRON PIPE
 - POWER POLE
 - GUY WIRE
 - PIPE BRIDGE FOUNDATION
 - SEWER VENT
 - WATER MANHOLE
 - SMALL VAT POTS IN PROCESS AREA (<5'x5')
 - TANKS WITH "WEEPING"
 - TANKS WITH SOLIDS REMAINING

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS ACTING UNDER THE DIRECTION OF A LICENSED ENGINEER, TO ALTER THIS DOCUMENT.

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED BY ANY MEANS. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

IN CHARGE OF _____	DESIGNED BY _____ CHECKED BY _____	DRAWN BY _____
1"=30'		
NO.	DATE	REVISION
INIT.		

RESOURCE RECOVERY GROUP
CLAYTON CHEMICAL SITE
LIQUIDS REMOVAL PHASE
SAUGET, ILLINOIS

SITE PLAN

FILE NO.
11331.31861
DATE
JULY 2004

1

APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR APRIL 9 – 13, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/86 DATE: April 30, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For April 9 - 13, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-first week (the period April 9 through April 13, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 9, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 9, 2007	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site. CRA received updated bid responses from 2 of the 3 contractors to address an alternate disposal strategy
April 10, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site
April 11, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. U.S. EPA contacted The Respondents regarding the status of a response to OSC Kevin Turner's April 2, 2007 questions/comments related to the oil. The Respondents informed U.S. EPA that a formal response was being developed in the form of a Response Plan. In addition, the dialog between The Respondents and U.S. EPA also included the possible approval of the proposed conceptual landfill cap design and UAO
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 11, 2007	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site
April 12, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site. CRA received bids for an alternate investigation method to define area conditions
April 13, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 13, 2007	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), or Phil Harvey (773-380-9933) for clarification.

Attachment

APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR APRIL 16 - 20, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/87 DATE: April 30, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For April 16 - 20, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-second week (the period April 16 through April 20, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 16, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
April 16, 2007	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 17, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site
April 18, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was informed via telephone of the planned April 19 th Site visit
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 18, 2007	Miscellaneous	CRA continues to develop a response plan, including securing an oil removal contractor, to address the material discovered at the northeast corner of the Site. CRA received an updated bid response from one of the contacted vendors to reflect a possible alternate disposal scenario. CRA also receives additional information for developing a formal response to the questions raised by OSC Turner in his April 2, 2007 e-mail
April 19, 2007	Mobilization Activities	CRA mobilized to the Site
	Project Coordination	START Bob Hill was on Site to observe Site activities. The Respondents submitted an Oil Response Plan to U.S. EPA/OSC Kevin Turner proposing proposed activities to address the discovered subsurface oil
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA performed an inspection of the area where oil was discovered/Oil Dry® was installed on the surrounding area. No changes in area conditions were noted
April 20, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 20, 2007	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



APPENDIX E

WEEKLY SUMMARY OF SITE ACTIVITIES FOR APRIL 23 - 27, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/88 DATE: April 30, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For April 23 - 27, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-third week (the period April 23 through April 27, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 23, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
April 24, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 24, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
April 25, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
April 26, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 26, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities. U.S. EPA/OSC Kevin Turner acknowledged receipt of the Oil Response Plan submitted on April 19, 2007. Additionally, OSC Turner requested that the proposed activities be completed with him on Site, and proposed a possible timeframe. OSC Turner also made a suggestion regarding project oversight by The Respondents to facilitate completion of the proposed actions
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA/The Respondents begin making inquiries to determine the possibility of accommodating OSC Turner's scheduling request regarding the response to the subsurface oil situation
April 27, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
April 27, 2007	Miscellaneous	CRA/The Respondents continue making inquiries to determine the possibility of accommodating OSC Turner's scheduling request regarding the response to the subsurface oil situation

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

APPENDIX F

VEOLIA ANALYTICAL REPORTS

(COMPOSITE SAMPLES [7] FROM MARCH 6, 2007 DRUM SAMPLES [27])

TWI LABORATORY ANALYSIS REPORT

This report has been prepared for the exclusive use and benefit of Onyx Environmental Services. No representation concerning sample validity or analytical accuracy or completeness is hereby made to any other person receiving this report. This sample was collected according to applicable SW-846 procedures.

Liquids (>5% Free Liquid) Solids (<5% Free Liquid)

Generator:		RR6	
Description:		Sample#	031207 P
Profile		Date Sampled:	
Sampled By:		Date Received:	

	Number of Layers	Date	Analyst
* ✓	99 2	3/20/07	Bl
* ✓	Free Liquid (%)		
* ✓	Pumpable		
* ✓	Color		
	Turbidity		
L * ✓	Viscosity		
* ✓	Physical State		
* ✓	Water Reactivity		
* ✓	Water Miscibility		
L/S * ✓	Radiation Screen		
* ✓	Oxidizer Screen		
* ✓	Cyanide Screen		
* ✓	Sulfide Screen		
	Flam. Pot. Screen		
L/S * ✓	pH Screen		
	Specific Gravity		
* ✓	Incidental odor		
	Paint Filter Test		
* ✓	BTU/LB		
* ✓	% Chloride		
L/S * ✓	PCBs By GC mg/kg		
L * ✓	Flash Point deg. F		
	pH by Meter		
	Metals:		
	Precursors		
	Other:		
	Compat:		
Comments:			

Analysis Approved By: _____

F. Formby, Lab Manager

Date: 3-21-07

Certification: Except as explicitly noted all analytical data reported above were obtained under my direction and supervision. Sample collection, preservation and analytical methods are as required by the TWI Waste Analysis Plan. This laboratory follows a quality assurance program.

G# 534578 TWI LABORATORY ANALYSIS REPORT

PTA004016

This report has been prepared for the exclusive use and benefit of Onyx Environmental Services. No representation concerning sample validity or analytical accuracy or completeness is hereby made to any other person receiving this report. This sample was collected according to applicable SW-846 procedures.

Liquids (>5% Free Liquid) Solids (<5% Free Liquid)

3-29-07

(280 Drum)

Generator:	RRG		
Description:	#1, 2, 9, 9A, 10, 12, 13, 19 (100%)	Sample#	031207T
Profile		Date Sampled:	
Sampled By:		Date Received:	

	Number of Layers	Date	Analyst
	Free Liquid (%)	3/28/07	FHK
	Pumpable	NO	
	Color	Brown Tan	
	Turbidity	NA	
L *	Viscosity	NA	
	Physical State	Solid Pesticide like granules dirt (Sieves)	
	Water Reactivity	Neg	
	Water Miscibility	Part Sol Sinks	
L/S *	Radiation Screen	= BG	
	Oxidizer Screen	Neg	
	Cyanide Screen	Neg	
	Sulfide Screen	Neg	
	Flam. Pot. Screen	Neg	
L/S *	pH Screen	6.0 10%	
	Specific Gravity		
	Incidental odor	None	
	Paint Filter Test	NA	
	BTU/LB		
	% Chloride		
L/S *	PCBs By GC mg/kg	Orig: 0.6 mg/kg Ar1254 Dup: 0.6 mg/kg Ar1254	3/16/07
L *	Flash Point deg. F		
	pH by Meter		
	Metals:	<div style="display: flex; justify-content: space-around;"> <div>As: 1.3 5.0</div> <div>Be: 0.51</div> <div>Cd: 1.6</div> </div> <div style="display: flex; justify-content: space-around;"> <div>Cr: 28 37.6</div> <div>Pb: 320 69.7</div> <div>Hg: <2.0</div> </div>	3/13/07
	Precursors	<div style="display: flex; justify-content: space-around;"> <div>Silver:</div> <div>2,4,5-T:</div> <div>PCP:</div> </div>	
	Other:		
	Compat:	H2O _____ Diesel _____ Toluene _____ Blend Tank _____	
	Comments:	PCB'S Present	

Analysis Approved By: _____

F. H. Formby, Lab Manager

Date: 3-21-07

Certification: Except as explicitly noted all analytical data reported above were obtained under my direction and supervision. Sample collection, preservation and analytical methods are as required by the TWI Waste Analysis Plan. This laboratory follows a quality assurance program.

G# 534578

TWI LABORATORY ANALYSIS REPORT

PTA 004016

This report has been prepared for the exclusive use and benefit of Onyx Environmental Services. No representation concerning sample validity or analytical accuracy or completeness is hereby made to any other person receiving this report. This sample was collected according to applicable SW-846 procedures.

(280 drums)

Liquids (>5% Free Liquid) Solids (<5% Free Liquid)

Generator:		RR6 (Soil, Sand)	
Description:		#5, 6, 7, 11, 15, 18, 20, 21, 22, 22, 24, 26	Sample# 031207U
Profile		Date Sampled:	
Sampled By:		Date Received:	

	Number of Layers	Date	Analyst
	1		
	Free Liquid (%) 0	3/28/07	FHF
	Pumpable NO		
* Color	Brown yellow		
* Turbidity	NA		
* Viscosity	NA		
* Physical State	Solid Sandy soil like, Plastic		
* Water Reactivity	Neg		
* Water Miscibility	Part Sol Sinks & Floats		
L/S * Radiation Screen	=BG		
* Oxidizer Screen	Neg		
* Cyanide Screen	Neg		
* Sulfide Screen	Neg		
* Flam. Pot. Screen	BLOC		
L/S * pH Screen	9 @ 10		
	Specific Gravity		
* Incidental odor	None		
	Paint Filter Test		
	BTU/LB		
	% Chloride		
L/S * PCBs By GC mg/kg	Orig: 3.6 mg/kg At 1254 Dup: 2.4 mg/kg At 1254	3/16/07	~
L * Flash Point deg. F			
	pH by Meter		
Metals: 00004	As: 21.3	Be: 0.79	Cd: 7.1
0006 0007	Cr: 50.6	Pb: 134.0	Hg: <2.0
0008			
Precursors	Silvex: _____	2,4,5-T: _____	PCP: _____
Other:			
Compat:	H2O _____ Diesel _____ Toluene _____ Blend Tank _____		
Comments:	Analysis Stopped Due to PCB'S Present		

Analysis Approved By: _____

F. H. Formby, Lab Manager

Date: 3-21-07

6#534578

TWI LABORATORY ANALYSIS REPORT

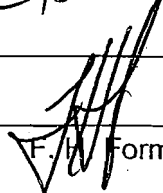
PTA004019

This report has been prepared for the exclusive use and benefit of Onyx Environmental Services. No representation concerning sample validity or analytical accuracy or completeness is hereby made to any other person receiving this report. This sample was collected according to applicable SW-846 procedures.

Liquids (>5% Free Liquid) Solids (<5% Free Liquid)

Generator:	RRG		
Description:	#17 (oil, water, dirt, debris)	Sample#	03/207Q
Profile		Date Sampled:	
Sampled By:		Date Received:	
Number of Layers	3	1/94/5	Date
Free Liquid (%)	95		3/28/07
Pumpable	yes		
Color	Brown / colorless / Tan		
Turbidity	opaque / transparent		
Viscosity	Med Low / Low / NA		
Physical State	Bilayered liquid w/ Floating Rags		
Water Reactivity	Neg		
Water Miscibility	Floats / Misc / Floats		
Radiation Screen	= BG		
Oxidizer Screen	Neg		
Cyanide Screen	Neg		
Sulfide Screen	Neg		
Flam. Pot. Screen	Neg		
pH Screen	6 @ 100%		
Specific Gravity	—		
Incidental odor	None		
Paint Filter Test	V Fil		
BTU/LB	—		
% Chloride	—		
PCBs By GC mg/kg	orig: 6.3 mg/kg Ar 1242 Dup: 5.8 mg/kg Ar 1242	3/16/07	KS
Flash Point deg. F			
pH by Meter			
Metals:	As: <5.0 Be: <0.1 Cd: <2.5 <1.0 (P008) Cr: 3.2 Pb: 18.1 Hg: <2.0	3/13/07	KS
Precursors	Silvex: 2,4,5-T: PCP:		
Other:			
Compat:	H2O Diesel Toluene BlendTank		
Comments:	PCB's		

Analysis Approved By:



Formby, Lab Manager

Date: 3.21-07

Certification: Except as explicitly noted all analytical data reported above were obtained under my direction and supervision. Sample collection, preservation and analytical methods are as required by the TWI Waste Analysis Plan. This laboratory follows a quality assurance program.

TWI LABORATORY ANALYSIS REPORT

396 994

This report has been prepared for the exclusive use and benefit of Onyx Environmental Services. No representation concerning sample validity or analytical accuracy or completeness is hereby made to any other person receiving this report. This sample was collected according to applicable SW-846 procedures.

Liquids (>5% Free Liquid) Solids (<5% Free Liquid)

Generator:	RR6		
Description:	#8	Sample#	031207 0
Profile		Date Sampled:	
Sampled By:		Date Received:	

	Number of Layers	Date	Analyst
	Free Liquid (%)	3/20/07	BSL
	Pumpable		
✓	Color	colorless	
	Turbidity		
L *	Viscosity	High Med	
✓	Physical State	Slg	
✓	Water Reactivity	Solubilities	
*	Water Miscibility	P/S/H	
L/S *	Radiation Screen	Neg	
✓	Oxidizer Screen	Neg	
✓	Cyanide Screen	Neg	
✓	Sulfide Screen	Neg	
	Flam. Pot. Screen		
L/S *	pH Screen	5 @ 10L	
	Specific Gravity		
✓	Incidental odor	None	
	Paint Filter Test		
✓	BTU/LB	13,520	3-20-07 JS
✓	% Chloride	10.5	1
L/S *	PCBs By GC mg/kg	<5.0	3/16/07
L *	Flash Point deg. F	>200	1
	pH by Meter		
	Metals:	As: <5.0 Be: <0.1 Cd: <1.0 Cr: <2.5 Pb: <2.5 Hg: <2.0	3/13/07 KS
	Precursors	Silvex: _____ 2,4,5-T: _____ PCP: _____	
	Other:		
	Compat:	H2O _____ Diesel _____ Toluene _____ BlendTank _____	
	Comments:		

Analysis Approved By: _____

F. H. Formby, Lab Manager

Date: 3/21/07

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Liquids (>5% Free Liquid) Solids (<5% Free Liquid)

Generator:	RRb		
Description:	#23 (grease)	Sample#	031207R
Profile	396994	Date Sampled:	
Sampled By:		Date Received:	

	Number of Layers	Date	Analyst
	Free Liquid (%)	3/20/07	Bl
	Pumpable		
* Color	tan		
Turbidity			
L * Viscosity			
* Physical State	solid		
* Water Reactivity	None		
* Water Miscibility	Similar		
L/S * Radiation Screen	Neg		
* Oxidizer Screen	Neg		
* Cyanide Screen	Neg		
* Sulfide Screen	Neg		
Flam. Pot. Screen			
L/S * pH Screen	6.0-10.0		
Specific Gravity			
* Incidental odor	None		
Paint Filter Test			
* BTU/LB	✓ 18,990	3-20-07	JS
* % Chloride	✓ 10.5	↓	m
L/S * PCBs By GC mg/kg	<5.0	3/16/07	m
L * Flash Point deg. F			
pH by Meter			
Metals:	As: <5.0 Be: <0.1 Cd: <1.0 Cr: <2.5 Pb: <2.5 Hg: <2.0	3/13/07	KS
Precursors	Silvex: _____ 2,4,5-T: _____ PCP: _____		
Other:			
Compat:	H2O _____ Diesel _____ Toluene _____ BlendTank _____		
Comments:			

Analysis Approved By: R. H. Formby, Lab Manager

Date: 3-21-07

Certification: Except as explicitly noted all analytical data reported above were obtained under my direction and supervision. Sample collection, preservation and analytical methods are as required by the TWI Waste Analysis Plan. This laboratory follows a quality assurance program.

TWI LABORATORY ANALYSIS REPORT

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Liquids (>5% Free Liquid) Solids (<5% Free Liquid)

Generator:	RRG		
Description:	#3, 4, 16, 25, 27 (cleaner products)	Sample#	031207S
Profile	396996	Date Sampled:	
Sampled By:		Date Received:	

	Number of Layers	Date	Analyst
	Free Liquid (%)	3/20/07	BT
	Pumpable		
✗	Color		
	Turbidity		
L *	Viscosity		
✗	Physical State		
✗	Water Reactivity		
✗	Water Miscibility		
L/S *	Radiation Screen		
✗	Oxidizer Screen		
✗	Cyanide Screen		
✗	Sulfide Screen		
	Flam. Pot. Screen		
L/S *	pH Screen		
	Specific Gravity		
✗	Incidental odor		
	Paint Filter Test		
✗	BTU/LB	1800	3-20-07 JS
✗	% Chloride	60.5	
L/S *	PCBs By GC mg/kg	25.0	3/16/07
L *	Flash Point deg. F		
	pH by Meter		
	Metals:		
	As: 7.2 Be: 0.24 Cd: 6.1		
	Cr: 28.9 Pb: 3.2 Hg: 42.0	3/13/07	KS
	Precursors		
	Silvex: _____ 2,4,5-T: _____ PCP: _____		
	Other:		
	Compat:		
	H2O _____ Diesel _____ Toluene _____ BlendTank _____		
	Comments:		

Analysis Approved By: _____

F. H. Formby, Lab Manager

Date: 3/21/07

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